

Before the
Federal Communications Commission
 Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 98-13
Table of Allotments,)	RM-9212
FM Broadcast Stations.)	
(Topeka, Iola and Emporia, Kansas))	
)	
TO: Chief, Allocations Branch		

REPLY COMMENTS OF INNOVATIVE BROADCASTING CORPORATION

Innovative Broadcasting Corporation ("Innovative") hereby submits the following reply comments in support of the rule changes proposed in this proceeding:

1. Innovative is the licensee of FM Broadcast Station KSEK, Girard, KS. Station KSEK presently operates on Channel 256A as a 3 kW facility. In Comments, filed in this proceeding under date of March 25, 1998, Innovative showed that if, as proposed, Station KIKS, Iola, KS, changes operating frequency from Channel 257A to Channel 268A, Station KSEK will be enabled to increase effective radiated power to 6 kW. Therefore, Innovative supported the proposed rule changes.

2. It now turns out that there is another rule making proceeding, in which the City of Pleasanton, KS, seeks to assign Channel 268 to Pleasanton, KS, as a Class C3 facility. *Amendment of FM Table of Allotments, Pleasanton, KS*, MM Docket No. 98-9, RM-9216. The assignment of Channel 268 to Pleasanton precludes the assignment of Channel 268 to Iola.

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Therefore, Station KIKS would have to stay on Channel 257, where it blocks an upgrade of Station KSEK to full 6 kW facilities.

3. In Reply comments, filed in the Pleasanton proceeding, Shawnee Broadcasting Corporation has demonstrated that alternative channels can be assigned to Pleasanton, either as Class allotments or as a Class C3 allotment. Innovative respectfully supports Shawnee's alternate suggestions. Innovative has no objection to the assignment of a Class C3 channel to Pleasanton, if that is feasible. Innovative points out, however, that a Class A allotment is more than sufficient to satisfy Pleasanton's presumed need for a first local transmission service. Innovative also respectfully submits that the public interest will be best served by a solution which allows all of the following to occur: (a) an upgrade in the facilities of Station KSEK, Girard, KS; (b) an upgrade in the facilities of Station KWIC-FM, Topeka, KS; and (c) the allotment of a channel as a first local transmission service to the city of Pleasanton, KS.

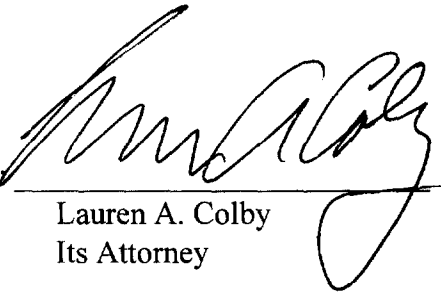
Respectfully submitted,

April 10, 1998

INNOVATIVE BROADCASTING CORPORATION

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By


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CERTIFICATE OF SERVICE

I, Kathleen McRorie, a secretary in the law office of Lauren A. Colby, do hereby certify that copies of the foregoing have been sent via first class, U.S. mail, postage prepaid, this 10th day of April, 1998, to the offices of the following:

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